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# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

Chapter 11

Case No. 19-10412 (JLG)

Debtors.

Debtors.

(Jointly Administered)

## NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON MARCH 14, 2019 AT 11:00 A.M. (ET)

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable James L. Garrity, United States Bankruptcy Judge, One Bowling Green, Courtroom 601, New York, New York 10004

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Debtors' principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

## I. <u>UNCONTESTED MATTERS</u>:

1. Motion of Debtors for (I) Authority to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Related Relief [ECF No. 13]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

## **Related Documents:**

- A. Interim Order (I) Authorizing Debtors to (A) Pay Employee Obligations, (B) Continue Employee Benefit Programs, (II) Granting Related Relief [ECF No. 52]
- B. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

2. Motion of Debtors for Authority to Pay Certain Prepetition Taxes and Fees [ECF No. 11]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

#### Related Documents:

- A. Interim Order Authorizing Debtors to Pay Certain Prepetition Taxes and Fees [ECF No. 69]
- B. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

3. Motion of Debtors for (I) Authorization to (A) Continue to Maintain Their Insurance Policies and Programs and Surety Bond Program and (B) Honor All Obligations with Respect Thereto and (II) Modification of the Automatic Stay with Respect to the Workers' Compensation Program [ECF No. 7]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

#### **Related Documents:**

A. Interim Order (I) Authorizing Debtors to (A) Continue to Maintain Their Insurance Policies and Programs and Surety Bond Program and (B) Honor All Obligations with Respect Thereto and

- (II) Modifying the Automatic Stay with Respect to the Workers' Compensation Program [ECF No. 70]
- B. Omnibus Certificate of No Objection [ECF No. 183]

Status: This matter is going forward on an uncontested basis.

4. Motion of Debtors for an Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Claims Against and Equity Interests in the Debtors [ECF No. 8]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

#### Related Documents:

- A. Interim Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Claims Against and Equity Interests in the Debtors [ECF No. 72]
- B. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

5. Motion of Debtors for Authorization to (I) Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Abandon Property in Connection Therewith [ECF No. 6]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

### Related Document:

A. Omnibus Certificate of No Objection [ECF No. 177]

<u>Status</u>: This matter is going forward on an uncontested basis.

6. Application of Debtors for Authority to Retain and Employ Weil, Gotshal & Manges LLP as Attorneys for Debtors *Nunc Pro Tunc* to Commencement Date [ECF No. 97]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

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## Related Document:

A. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

7. Application of Debtors for Authorization to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Agent *Nunc Pro Tunc* to the Commencement Date [ECF No. 98]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

### Related Document:

A. Omnibus Certificate of No Objection [ECF No. 177]

<u>Status</u>: This matter is going forward on an uncontested basis.

8. Debtors' Application for an Order Authorizing the Retention and Employment of AlixPartners, LLP as Financial Advisor *Nunc Pro Tunc* to the Commencement Date [ECF No. 99]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

## Related Document:

A. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

9. Application of Debtors Requesting Entry of an Order Authorizing Debtors to Retain Houlihan Lokey Capital, Inc. as Investment Banker for Debtors *Nunc Pro Tunc* to Commencement Date [ECF No. 100]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

### Related Document:

A. Omnibus Certificate of No Objection [ECF No. 183]

<u>Status</u>: This matter is going forward on an uncontested basis.

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10. Application of Debtors for Authority to Retain and Employ Protiviti Inc. as Business Consultant for the Debtors *Nunc Pro Tunc* to the Commencement Date [ECF No. 101]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

## **Related Document:**

A. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

11. Application of Debtors for Authority to Retain and Employ Ernst & Young LLP as Auditor and Tax Advisor for Debtors *Nunc Pro Tunc* to Commencement Date [ECF No. 102]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

## **Related Document:**

A. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

12. Application of Debtors for Authority to Employ and Retain PricewaterhouseCoopers LLP as Tax, Valuation, and Accounting Consultants to the Debtors *Nunc Pro Tunc* to the Commencement Date [ECF No. 103]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

### Related Document:

A. Omnibus Certificate of No Objection [ECF No. 177]

Status: This matter is going forward on an uncontested basis.

13. Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [ECF No. 107]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

## **Related Document:**

A. Omnibus Certificate of No Objection [ECF No. 183]

Status: This matter is going forward on an uncontested basis.

14. Motion of Debtors for Authority to Employ Professionals Used in Ordinary Course of Business [ECF No. 111]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

## Related Document:

A. Omnibus Certificate of No Objection [ECF No. 177]

<u>Status</u>: This matter is going forward on an uncontested basis.

15. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Continue Honoring Reverse Issuer and Servicing Obligations in the Ordinary Course and Granting Related Relief, (II) Modifying Automatic Stay on a Limited Basis to Facilitate Debtors' Ongoing Operations, and (III) Scheduling a Final Hearing [ECF No. 10]

Response Deadline: March 7, 2019 at 4:00 p.m.

Responses Filed: None.

#### Related Document:

A. Interim Order (I) Authorizing Debtors to Continue Honoring Reverse Issuer and Servicing Obligations in the Ordinary Course and Granting Related Relief, (II) Modifying Automatic Stay on a Limited Basis to Facilitate Debtors' Ongoing Operations, and (III) Scheduling a Final Hearing [ECF No. 54]

Status: This matter is going forward.

## II. CONTESTED MATTER:

16. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Continue Origination and Servicing of Forward Mortgage Loans in Ordinary Course and Granting Related Relief, (II) Modifying Automatic Stay on a Limited Basis to Facilitate Debtors' Ongoing Operations, and (III) Scheduling a Final Hearing [ECF No. 9]

Response Deadline: March 7, 2019 at 4:00 p.m.

## Responses Filed:

- A. Limited Objection to Debtors' Motion for Interim and Final Orders (I) Authorizing Debtors to Continue Origination and Servicing of Forward Mortgage Loans in Ordinary Course and Granting Related Relief, (II) Modifying Automatic Stay on a Limited Basis to Facilitate Debtors' Ongoing Operations, and (III) Scheduling a Final Hearing [ECF No. 162]
- B. Debtors' Reply to Limited Objection [ECF No. 176]

## **Related Documents:**

C. Interim Order (I) Authorizing Debtors to Continue Origination and Servicing of Forward Mortgage Loans in Ordinary Course and Granting Related Relief, (II) Modifying Automatic Stay on a Limited Basis to Facilitate Debtors' Ongoing Operations, and (III) Scheduling a Final Hearing [ECF No. 55]

Status: This matter is going forward on a contested basis.

## III. ADJOURNED MATTERS:

17. Debtors' Motion for Interim and Final Orders (A) Authorizing Debtors to Enter into Repurchase Agreement Facilities, Servicer Advance Facilities and Related Documents; (B) Authorizing Debtors to Sell Mortgage Loans and Servicer Advance Receivables in Ordinary Course of Business; (C) Granting Back-Up Liens and Superpriority Administrative Expense Claims; (D) Authorizing Use of Cash Collateral and Granting Adequate Protection; (E) Modifying the Automatic Stay; (F) Scheduling a Final Hearing; and (G) Granting Related Relief [ECF No. 26]

Response Deadline: March 19, 2019 at 4:00 p.m.

### Responses Filed:

- A. The Texas Taxing Jurisdictions Objection to Debtors' Interim Order [ECF No. 151]
- B. International Fidelity Insurance Company and Allegheny Casualty Company's Objection to Debtors' Motion for Interim and Final Orders [ECF No. 161]
- C. Geary Class Action Protective Objection to the Entry of Final Relief [ECF No. 163]

## **Related Documents:**

- D. Declaration of Jeffrey Lewis in Support of Debtors' Motion [ECF No. 27]
- E. Notice of Filing Exhibits to DIP Motion [ECF No. 49]
- F. Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 507, 546, 548, 555, 559, 560 and 561 (A) Authorizing Debtors to Enter into Repurchase Agreement Facilities, Servicer Advance Facilities And Related Documents; (B) Authorizing Debtors To Sell Mortgage Loans And Servicer Advance Receivables In The Ordinary Course Of Business; (C) Granting Back-Up Liens And Superpriority Administrative Expense Claims; (D) Authorizing Use Of Cash Collateral And Granting Adequate Protection; (E) Modifying The Automatic Stay; (F) Scheduling A Final Hearing; And (G) Granting Related Relief [ECF No. 56]
- G. Notice of Filing Revised Exhibits to DIP Motion [ECF No. 63]

Status: This matter has been adjourned to March 26, 2019.

18. Motion of Debtors Requesting Authority to (I) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (II) Implement Changes to the Cash Management System in the Ordinary Course of Business, (III) Continue Intercompany Transactions, (IV) Provide Administrative Expense Priority for Postpetition Intercompany Claims, (V) Extend Time to Comply with, or Seek Waiver of, 11 U.S.C. § 345(b) and (VI) Granting Related Relief [ECF No. 4]

Response Deadline: March 19, 2019 at 4:00 p.m.

Responses Filed: None.

Related Documents: None.

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Status: This matter has been adjourned to March 26, 2019.

Dated: March 12, 2019 New York, New York

/s/ Sunny Singh
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